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May 11, 2011

Hon. Stanley R. Chesler  
United States District Court  
Martin Luther King, Jr. Federal Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07101

Re: White v. Smiths Group, plc, et al.  
Docket No. 2:10-cv-04078-SRC-MAS  
Motion for Reconsideration, returnable June 6, 2011

Dear Judge Chesler:

This firm represents the Plaintiff who on May 2, 2011, filed a Notice of Motion for reconsideration of Your Honor's April 18, 2011 order granting in part the Defendants' R. 12(b)(6) motions. She also seeks leave to amend the pleading to add facts that the court's opinion indicated are necessary to her causes of action.

Since the filing of the Plaintiff's motion, the facts in the First Amended Complaint have changed. Plaintiff requests leave to amend her pleading to include these developments. On May 3, 2011, the Defendant Smiths Detection announced that Stephen Phipson, who had been President of Smiths Detection, has stepped down and left the company. The Defendant Philip Bowman (whom the court dismissed for lack of personal jurisdiction) has assumed the duties of President of Smiths Detection effective immediately. Plaintiff respectfully asks leave to allege these facts in her amended pleading.

Respectfully submitted,  
LAW OFFICE OF ELLEN O'CONNELL, L.L.C.

By: \_\_\_\_\_ s/Ellen O'Connell  
Ellen O'Connell

cc: Sarah Bouchard, Esq.  
Jyotin Hamid, Esq.